

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

CARLA BEEN,
*individually and on behalf of
all others similarly situated,*

Plaintiffs,

V.

SUNSHINE CLEANERS PLUS, INC.

Defendant.

Case No. 19-CV-02836-RLW

JURY TRIAL DEMANDED

PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff Carla Been, individually and on behalf of all others similarly situated, hereby files this Notice of Supplemental Authority in Support of her Motion to Remand this matter back to Missouri State Court (Doc. 6).

1. As both parties have pointed out to the Court, Plaintiff has filed multiple other lawsuits that are nearly identical to the present lawsuit, but are each directed at separate defendants.
2. In each of those lawsuits, Defendant removed the lawsuit, and then Plaintiff moved to remand under nearly identical circumstances to the present. Indeed, all of the arguments for remand are the same, and are all based upon materially-similar facts.
3. In one of those lawsuits, *Been v. "Hope Cleaners,"* 19-cv-0931-SNJL, also formerly pending in the United States District Court for the Eastern District of Missouri, the Court disposed of motions nearly identical to those pending herein, deciding to remand the lawsuit and, in light of there being no objectively reasonable basis for removal, to award Plaintiff her fees incurred in removing to remand.
4. Plaintiff submits a copy of that Court's order as Supplemental Authority herein. **Exhibit A.**

5. While aware such authority is not mandatory authority, Plaintiff submits that such authority is extremely persuasive, as the underlying issues and arguments are nearly identical to those the Court is considering herein.
6. Plaintiff urges the Court to take such precedent into consideration and to rule similarly in disposing of Plaintiff's Motion to Remand.

Respectfully submitted,

DANIEL F. HARVATH, ESQ.

By: */s/ Daniel F. Harvath*
Daniel F. Harvath, #57599MO
HARVATH LAW GROUP, LLC
75 W. Lockwood, Suite #1
Webster Groves, MO 63119
(314) 550-3717
dharvath@harvathlawgroup.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

The Undersigned hereby certifies that the foregoing document was served upon all counsel of record automatically by the Court's CM/ECF system.

/s/ Daniel E. Harvath_____.